

April 12, 2012

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RE: File Number: 11-57-0075 P County Road 595 Public Comment – Marquette, MI

I am writing in response to the proposed development of CR 595 in Marquette County, Michigan. As a long time resident living off CR AAA and CR 510, I have watched the unfolding of the Kennecott Mining operation in my neighborhood. They have neither been straightforward nor transparent in their actions and this proposal to develop a new county road from AAA south to the Humboldt Mill is, unfortunately, more of the same.

**The Description of the Project** is clearly not intended as a forthright description of intent by the Marquette County Road Commission. With Kennecott paying all the bills for the filing of this permit application, engineering costs, etc – this is a Kennecott Eagle Minerals Haul Road and should be noted as such. Rio Tinto should have first filed for a Part 632 amendment to their existing mining permit and this Wetlands permitting process should have been part of that. This would clearly determine to all intents and purposes the real intention of this project and scope. Then clear environmental determinations would have been fully scoped, or at least purported to be, by the company. This is a blatant duplication of effort from Kennecott's failed Woodland Road venture and needs to be handled in exactly the same way. Objection by the EPA, USFW and USACE to this process.

**Public Health, Safety and Welfare**

The application states public health and safety and better emergency services. Big Bay is 20 minutes away by good road to the site for fire and EMS services. If Champion is the service provider, they are 60-75 minutes, at the very best, from the site. Sheriff and other policing entities are much closer to the site via CR 550 than traveling 23.7 miles west

from Marquette just to get to CR 595 and then heading north another 27 miles to the sites. The application states that there is only one way in to the site from 550/510/AAA and the new road is intended to protect the workers by having two routes to get to them. We build a massive road like this through that country to offer duplicating safety services to mine workers? Hire a helicopter if it is an emergency. Take the back roads out otherwise – that is what we all do in those cases.

### **Maps/Descriptions of Roadway, Bridges etc**

In looking at the maps and other diagrams concerning the Yellow Dog River, the maps showing the road bed are not the same. One map shows the road way heading northeast, the other northwest – which one is it? The bridge design for the Yellow Dog shows the road heading northwest directly through some beautiful marsh/bog and forest wetlands. These are obviously maps/configurations from a “work in progress” over many years and NOT one final document to give public comment on. I would need a good final analysis to work on showing clearly the final configuration of the road.

### **Wetland Mitigation**

Have you seen the current wetlands mitigation project at the “Humboldt Wetlands” on US 41? This has been “worked” by Kennecott for the past four years or so and it went from a nice little wetlands complex to an horrendous mess of ‘manufactured’ water and trunks of trees to simulate a wetlands all surrounded by huge piles of dredgings which, of course, are making their ways into the water. This site is supposed to be one of their premiere wetland mitigation demonstration sites. If this is the best they can do, it is not even close to the complexity of how a real wetlands looks, feels and works. The diversity of these wetlands are amazing – bog, fen, marsh and swamp along with wonderful little streams and rivers. Please do not let them do this to the beautiful stretches north of Wolf Lake where the rare species thrive, grow and remind us of what the rest of Michigan looked like before growth and unadvised development of this sort took place.

### **Environmental Impacts**

Again the permit application is a hodge podge of different work done over the years and is not a good analysis of what the road will be really used for and what the road is intended for. Using this roadway as a mining haul road has different environmental considerations to take into account versus as a straightforward public road. Where is the analysis of sulfide dust and particles along the roadway. Mines typically have issues with haul roads – why was the analysis of this one different. Again, the criteria of Part 632 would in the very least, have required more and rigorous environmental assessment. I do not see this in the application.

No one anywhere has talked about the blasting and mountain top removal that would need to be accomplished to bring this road to grade. Thousands of tons of rock would need to be blasted and removed. If it is to be used as fill, where is the metals analysis showing us what the sulfide content of this rock is? Greens Creek Mine near Juneau, Alaska has miles of roadways and bridges using “development” rock which is not leaching Acid Mine Drainage into the waters and lands along the roadway. Obviously,

sulfide rock is an issue in this area – where is the rock assessment to ensure that fill put in these miles of wetlands are not reactive rock?

By the way, have you ever seen the hundreds if not thousands of narrow leaved gentian that grow in the Yellow Dog, Mulligan Creek and Wildcat Canyon watersheds? It is a breathtaking sight and one this road needs to avoid at all costs – not minimize, not mitigate but avoid.

### **Road Traffic and Recreation**

I think I mentioned that I live near the CR 510 and AAA. I would much rather put up with those trucks going on the AAA/510/550 as they have permitted in their existing mining permit than destroy the last of the last of our wonderful wetlands in Michigan. Certainly, no one wants to live on a haul road, but at least there are still places to go that are untrammled and wild for people who love the wild to recreate in. Hiking, biking, snowmobiling and other sports will go elsewhere if you put in a full paved road with 55 mile an hour speed limits on it – and dodging heavy truck traffic to boot. Not any fun for anyone I know who lives in and loves the wild and Pure Michigan. The tourist industry in Marquette County would suffer not benefit from this loss of wild areas. People come to the U.P. for wild - not the same-o same-o of urban roadways and industrialized areas from which many tourists come from.

The state of Michigan has spent millions, I am sure, in bringing back the Moose to the U.P. This proposed road cuts right through the best area I know to view Moose and their young. The only way I will see a Moose if this road goes through - is dead along side the road. We need to avoid this area – not minimize it or mitigate it (how do you mitigate a dead moose). Kennecott and others need to just need to use already developed roads made for hauling large trucks and handling lots of traffic.

Have you seen a winter in this part of the U.P.? I do not know how they will possibly keep that road open through those hills and high elevations. It will be a dangerous trek for workers coming and going, for suppliers and forget the impact to the general public. Talk about concerns about public health and safety. When asked about whether suppliers will use the shorter route from Marquette or the new CR 595, the Kennecott official stated “They will use the road we make them use”. Nice. They will make their workers, suppliers, etc use CR 595 even though it is longer and more dangerous in winter. Again, health and safety concerns at its best.

### **Conclusion**

I am not scientist, but clearly the work and effort of good science has not been done here. I defer and support the comments made by the Army Corps of Engineers in their March 29, 2012 letter to the EPA.

Please use all discretionary means possible in your conversations to the Michigan Department of Environmental Quality to ensure that this proposal is rejected. I do not see where the Public Interest and Good is served here by this proposal and certainly the

only interest served is that of Kennecott Minerals. Assuredly, our aquatic resources will not only be disrupted but will be destroyed. There are other already developed roads – let Kennecott look to those roads to haul this ore out of the Yellow Dog Plains and use the plan they were permitted for – railways from Marquette to the Humboldt Mill thereby bypassing the urban areas of Marquette, Ishpeming and Negaunee which seem to be what this is all about anyway.

In searching the DEQ website for more information, I find the whole conversation is about preserving and saving our diminishing wetlands. Nice website, pretty pictures, good talk. Let us make sure that what we have left stays there for the good of us all, our wildlife, our fisheries, our water and our legacy to this planet.

I thank you for the good work you all do for our country,

Cynthia Pryor



Cc: Jean Battle  
Chris Mensing